

FRANK M. FLANSBURG III, ESQ., Nevada Bar No. 6974  
[fflansburg@bhfs.com](mailto:fflansburg@bhfs.com)  
EMILY A. ELLIS, ESQ., Nevada Bar No. 11956  
[cellis@bhfs.com](mailto:cellis@bhfs.com)  
MALIQ I. KENDRICKS, ESQ., Nevada Bar No. 15254  
[mkendricks@bhfs.com](mailto:mkendricks@bhfs.com)  
JAMIE P. LEAVITT, ESQ., Nevada Bar No. 16268  
[jleavitt@bhfs.com](mailto:jleavitt@bhfs.com)  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106  
Telephone: 702.382.2101  
Facsimile: 702.382.8135

*Attorneys for Plaintiff Lausteveion Johnson*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LAUSTEVEION JOHNSON,

Plaintiff,

v.

DAVID WILLIS, et al.,

Defendants.

CASE NO. 2:17-cv-01121-APG-EJY

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

**(THIRD REQUEST)**

Plaintiff Lausteveion Johnson (*"Plaintiff"*), by and through his counsel of record of the law firm Brownstein Hyatt Farber Schreck, LLP, and Defendants Rashonda Smith and Douglas Thrasher (*"Defendants,"* and together with Plaintiff, the *"Parties"*), by and through their counsel of record of the State of Nevada, Office of the Attorney General, hereby stipulate and agree, contingent on this Court's approval, as follows:

1. This stipulation is made pursuant to LR IA 6-1.
2. On July 11, 2023, Defendants filed their Motion for Summary Judgment (*"Defendants' Motion"*). See ECF No. 174.
3. Plaintiff's response to Defendants' Motion was originally due on August 1, 2023.
4. On July 21, 2023, this Court granted the Parties' Stipulation and Order to Extend Time for Plaintiff to Respond to Defendants' Motion for Summary Judgment (First Request), extending the deadline for Plaintiff to file a response to Defendants' Motion until fourteen (14)

1 days after the conclusion on any unsuccessful global settlement conference or mediation. *See* ECF  
2 No. 176.

3 5. Following a failed settlement conference, on October 19, 2023, this Court granted  
4 the Parties' Stipulation and Order to Extend Time for Plaintiff to Respond to Defendants' Motion  
5 for Summary Judgment (Second Request), extending the deadline to October 26, 2023. *See* ECF  
6 No. 181.

7 6. Plaintiff's counsel was notified on October 25, 2023, that Plaintiff was taken into  
8 custody on October 12, 2023 for a parole violation, which has impacted Plaintiff's counsel's ability  
9 to meaningfully consult with Plaintiff regarding his response to Defendants' Motion.

10 7. The parties have agreed to an additional two-week extension for Plaintiff to submit  
11 his response to Defendants' Motion, which would make the deadline to file a response November  
12 9, 2023.

13 8. This is the third request for an extension of this deadline.

14 9. This stipulation is made in good faith and is not made in an attempt to delay  
15 proceedings.

16 **IT IS SO STIPULATED.**

17 DATED this 26th day of October, 2023.

DATED this 26th day of October, 2023.

19 /s/ Maliq I. Kendricks  
20 Frank M. Flansburg, III., Esq.  
21 Emily A. Ellis, Esq.  
22 Maliq I. Kendricks, Esq.  
23 Jamie P. Leavitt, Esq.  
24 BROWNSTEIN HYATT FARBER  
25 SCHRECK, LLP

*Attorneys for Plaintiff Lausteveion Johnson*

/s/ Leo T. Hendges  
Aaron D. Ford, Esq.  
Leo T. Hendges, Esq.  
STATE OF NEVADA  
Office of the Attorney General

*Attorneys for Defendants Rashonda Smith and  
Douglas Thrasher*

26 **IT IS SO ORDERED.**

27 DATED: October 30, 2023

28   
UNITED STATES DISTRICT JUDGE